

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

CURTISS N. AYERS

NO. 20-12122 AMC
CHAPTER 13

*CERTIFICATION OF BREACH OF STIPULATION/ADEQUATE PROTECTION ORDER
WITH CAB EAST LLC/FORD MOTOR CREDIT COMPANY*

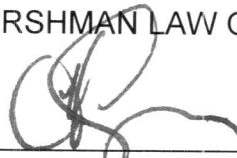
TO THE CLERK:

I certify that Debtor has breached the Adequate Protection Order with cab East LLC/Ford Motor Credit Company, LLC approved by this Court on November 24, 2020 [Doc. 31], having failed to make required payments regarding a leased 2018 Ford F-150 [VIN...63037] motor vehicle, or to provide proof of current insurance. Notice of the default, dated February 11, 2021 was served upon Debtor and Debtor's counsel, a true and correct copy of which is attached as Exhibit 1. As of this date the default in payment (\$2,923.30) and proof of insurance remain uncorrected.

WHEREFORE, Ford Motor Credit Company, LLC prays this Honorable Court to enter an Order granting it relief from the automatic stays of the Bankruptcy Code, with waiver of FRBP 4001(a)(3), as allowed by the Adequate Protection Order.

Date: February 23, 2021

GERSHMAN LAW OFFICES, PC



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